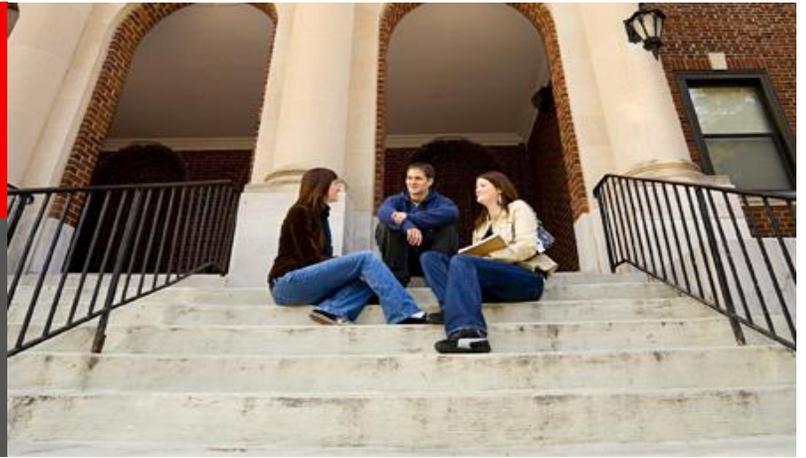


RISK CONTROL

Risk Management Guide



RISK CONTROL

REDUCE RISK. PREVENT LOSS. SAVE LIVES.

Educational Institutions Risk Management Guide

From facilities, grounds and equipment to events and people, educational institutions have a wide range of assets, operations, exposures and potential hazards to manage every day. Many educational institutions, in fact, are like mini-cities with a multiplicity of challenges in operating and controlling day-to-day exposures and potential for loss. Some hazards and exposures are common to most businesses, including schools. Others are more unique to educational institutions, such as those associated with student living, athletics, day trips, and travel and study abroad. Additionally, schools may be challenged by the social and emotional development of its student population, which can include “at-risk”/troubled student behaviors ranging from depression and suicide to violence against others. Student mental, emotional and social needs play an important role in an educational institution’s loss prevention program.

Crisis planning and emergency management continue to evolve, with expanded use of personal communication technologies and a centralized “incident command system” to integrate communication, coordination and collaboration across campus departments and community agencies and to enhance real-time incident response.

Effective loss control strategies and programs can help educational institutions address the challenges, reduce loss, maximize learning in the context of a safe and healthy environment and enable schools to do what they are established to do: educate the youth of today to be responsible, healthy and productive adults and leaders of tomorrow. This guide provides an overview of risk exposures and loss topics common to educational institutions, with several topics specific to higher education.

Property protection and fire life safety

The property loss potential for educational institutions depends on several variables. These include the age, size,

construction, number, use, contents and condition of facilities (e.g., chapels, stadiums, residence halls, cafeterias, laboratories, work shops, bookstores, media labs, classrooms, libraries and museums, medical facilities, power cogeneration house); operations (e.g., welding/cutting, power generation, medical treatment); biohazards/chemicals and flammables and combustibles; age and condition of electrical wiring and electrical equipment; natural disasters and terrorist acts; and the adequacy of its loss control programs and measures, including premises security, property/fire protection and emergency management. According to the U.S. Fire Administration (USFA), the three top causes of fires in educational institutions are cooking, smoking and arson.

Circuit overloading, faulty wiring and items such as candles, hot plates and torchiere lamps also can contribute to school fires. Laboratories that store and handle chemicals present not only a risk of fire and explosion but are viewed by Homeland security as targets for terrorism and may require threat assessments and planning under Homeland security regulations. Dormitories and Greek housing (sorority and fraternity buildings), as well as off-campus housing, can present serious fire life safety issues. Fires can have financial impact beyond property damage and loss of life: students may drop out due to the trauma and seek tuition reimbursement; the college may lose its funding; and the press may negatively impact the school’s ability to attract new students.

In addition to fire loss, theft, burglary and vandalism account for major property losses at educational institutions. This includes car theft, bookstore shoplifting, and loss to musical instruments, art and library collections, computers and mechanics’ tools. Natural disasters also take their toll.

Loss control considerations include, but are not limited to:

Educational Institutions Risk Management Guide

Fire protection

Everyone – students, every level of staff, visitors and contractors – has responsibility for fire safety.

Students, residential advisors and fire safety

Students and resident advisors need to know the school's policies on fire safety and fire safe practices, particularly for residence living, whether on campus in dormitories or Greek housing (fraternities and sororities) or off campus. Fire safety communications should target everyone. Fire safety and fire safe practices can be delivered at orientation, in student handbooks/manuals and through other communications. References should include, but not be limited to:

- Bans and limitations on highly flammable/combustible items (fabrics and decorations) and known sources of school fire, such as candles, incense, halogen lamps, cooking equipment, hot plates, portable heaters and smoking in dorm rooms. Some chapels are substituting electrical candles for open flame, wax candles. Many colleges confiscate banned items and fine students who do not adhere to policy.
- Cooking restrictions to designated areas, with caveats that active cooking should never be left unattended.
- Laboratory safety practices around the handling and storage of chemicals, flammable liquids, Bunsen burners, as well as shutting off gas valves.
- Electrical safety, including overloading electrical outlets with power strips and extension cords.
- Smoke detector testing and maintenance. Smoke detectors should never be disarmed.
- Fire alarm and fire extinguisher use and response, including policies regarding your false fire alarms. Tampering with smoke alarms or making false alarms may be a criminal offense. Many schools use a combination of prank-reporting, closed circuit cameras and discipline/fining to control this exposure.
- Escape plans and evacuations, including familiarity with fire exit locations and drill participation. Fire evacuation plans and drills are important for all areas in the school and throughout the campus. Designated fire captains should enforce student participation in drills as a critical part of real event response.
- Good housekeeping, including keeping access to exits, doors and safety devices free.
- Signing up for email notification of recalls on the Consumer Product Safety Commission Website. This includes recalls on electrical and other household products.

Electrical safety management

Many school fires have been associated with electrical overloading and worn wiring. Loss control considerations include, but are not limited to:

- Inspect, clean/dust, repair/replace outlets, frayed wiring, and electrical devices and equipment, including bathroom exhaust fans. Electrical work should be done by a person licensed or certified to do the work.
- Avoid temporary wiring.
- Inspect condition of aluminum wiring (used in construction between 1965 and 1973). [Aluminum wiring can pose a fire hazard](#), in certain circumstances.
- Ensure proper installation of metal halide lighting (often found in storage facilities).
- Use only Underwriters Laboratories UL-listed electrical appliances.
- Ground all equipment.
- Avoid overloading electrical circuits/outlets. Each large piece of equipment should be run on its own circuit.
- Discourage the use of extension cords by students and faculty, to reduce the overload potential.
- Have professionals check your electrical system annually and heating, ventilation and air conditioning (HVAC) systems at least semi-annually.
- For students, Underwriting Laboratories offers [Dorm Room Safety 101](#) as part of student electrical safety.

Flammable and combustible safety management

Print shops, laboratories, custodial/maintenance, grounds operations, woodworking shops and more: Many activities in and around schools use flammable liquids and chemicals. Loss control considerations include but are not limited to:

- Flammable/combustible storage, handling, spill response and disposal programs, including use of appropriate containers, cabinets and storage rooms.
- Compliance with manufacturers' instructions.
- Appropriately fire-rated/less flammable furniture, furnishings and fabrics in classrooms, offices, auditoriums and residence halls.
- Less flammable/combustible liquid substitutes where available (water or plant/bio-based).
- "No Smoking" signs in closed areas where chemicals or flammable liquids are used.

Educational Institutions Risk Management Guide

- Proper ventilation, including in flammable and chemical storage rooms.
- Suitable combustion controls for gas or oil fired building and process equipment.
- Maintenance of hydraulic systems, including cleaning and inspecting, and use of only low-hazard fluids in these systems.
- Wood dust collection systems, to reduce explosion and fire potential.
- Access to product Material Safety Data Sheets for flammability/explosive guidance.

Laboratory safety management

School laboratories may house chemicals that have reactive properties, including explosiveness, when mixed with other chemicals or when they exceed their recommended shelf life. In addition to following flammable and combustible safety practices, school labs should follow best laboratory safety practices, including, but not limited to:

- Proper storage and security for chemicals; Knowledge on chemical compatibility/incompatibility to avoid explosions and other hazardous reactions;
- Chemical inventory, including the age/expiration date of chemicals;
- Proper chemical disposal management;
- Inspection of gas lines and rules around Bunsen burners and closing gas valves after use;
- Class D fire extinguishers for certain metals.

Chemical Management: Homeland Security Chemical Facility Anti-Terrorism Standards

In 2007, Homeland Security issued its [Chemical Facility Anti-Terrorism](#) Interim Final Rule, along with an appendix, for certain chemicals (highly flammable/above a specified quantity) at certain aggregate levels. Many of the chemicals are common in academic laboratories at low thresholds. Compliance entails a vulnerability assessment using a [“Top Screen”](#) tool and security planning, predicated on Homeland Security’s analysis of the threat posed by the facility. Several education and campus safety associations are working with Homeland Security on behalf of the university community.

Food services/commercial cooking

Cooking activities are the second leading cause of fires in the United States and on college campuses. Fixed pipe, wet chemical suppression systems, in accordance with the National Fire Protection Association’s NFPA 96, are

recommended particularly to protect greasy kitchen cooking surfaces. Other loss control considerations include, but are not limited to:

- Proper handling/storage of flammable/combustibles;
- Proper cleaning of cooking surfaces, exhaust fans/vent hoods and cooking devices and equipment;
- Weekly cleaning or changing of filters;
- Equipping deep fat fryers with high temperature controls to cut off fuel supply when temperatures exceed 475° Fahrenheit;
- UL-listed grease extractor collectors in accordance with the manufacturer’s specifications;
- Training on and ready access to appropriate extinguishers for classes of kitchen fires;
- Good housekeeping and safe electrical practices;
- Quarterly inspection and cleaning of interior hoods and ducts by an outside qualified contractor to remove grease accumulation;
- Semi-annual maintenance, inspection and testing of the automatic extinguishing system by an outside qualified fire protection contractor.

Hot works

Follow best practices for **hot work operations** (welding and cutting) including a hot works permit system. Follow NFPA 51 B, *Standard for Fire Protection During Welding, Cutting and other Hot Work*; Require hot work compliance by outside contractors.

Good housekeeping and other controls

Poor housekeeping, including clutter and debris on the floor, in aisles, stairwells, corridors or near routes of entrance and exits everywhere throughout the school and its campus, can contribute not only to the fire load but also can impede the ability of occupants to readily exit and evacuate in the event of an emergency. Students, teachers and maintenance personnel all have responsibility to ensure they are exercising good housekeeping practices in general and related to storage of chemicals, cleaning agents and other flammable and combustible liquids. Other considerations include:

- Keep laundry facilities clean, particularly dryer vents.
- Inspect, maintain, and promptly repair/replace as needed, gym, exercise and playground equipment. All equipment should be certified by appropriate agencies.

Educational Institutions Risk Management Guide

- Inspect, maintain and promptly repair/replace as needed trash chutes and compactor equipment.
- Observation/inspection of contractor general fire safety practices during new construction or renovations.

Fire protection devices/systems and fire teams

Many school buildings were built before present-day fire codes were in place. According to the USFA, it is difficult to prescribe a “one size fits all nationwide solution” for fire protection due to jurisdictional differences and, for schools, a lack of property control in some instances. Loss control considerations include, but are not limited to:

- Have a fire protection team, with assignment of roles and responsibilities for your fire protection program. Larger schools spread this across departments;
 - > Include your local fire department in your plans;
 - > Train personnel and students in the proper use of fire protection equipment, as appropriate.
- Provide a sufficient number of readily available ABC rated and properly classified fire extinguishers for the five types of fire, Class A, B, C, D and K. Students and staff should know which extinguisher is recommended for the class/source of fire, such as, chemical, grease, electrical, paper or wood.
- Provide a fixed fire protection system, including but not limited to sprinkler systems; standpipe and fire hose systems; fire pumps; and fixed chemical extinguishing systems.
- Provide automatic sprinkler protection and/or a clean agent gaseous suppression system for the computer/server room.
- Routinely inspect, test and have your sprinkler system and fire detection and alarm equipment/devices serviced by a qualified professional.
- Use a red tag permit system for impairments/questionable conditions and address immediately.
- Maintain fire protection and detection equipment during construction and demolition.
- Arrange fire detection and alarm devices to be connected to your local fire department or through a central station alarm monitoring facility.
- Store products at least 18 inches below sprinkler heads.

Campus fire safety right-to-know act

Fire administrators and the NFPA have identified parents as a group that, historically, has been overlooked in campus fire safety messages. They recommend that fire safety messages target parent groups. Major fire safety organizations have been strong advocates of the [Campus Fire Safety Right-to-Know Act](#) (H.R. 592) – legislation that would require colleges and universities to report information on campus fire safety to the public and the U.S. Department of Education (US ED). Proponents say the legislation would raise the bar on campus fire safety and help parents identify schools that put a strong emphasis on fire safety.

Fire life safety

- Communicate fire life safety messages to everyone including those living in Greek housing and off campus.
- Communicate to all employees, staff, students and resident assistants your emergency plan. Also communicate your emergency plan to all third parties on your premises.
- Conduct drills throughout the year. Audit results and make improvements, including to evacuation procedures.
- Use trained resident assistants on each floor as part of your fire/life safety team.
- Keep material, inventory and trash free from exits, corridors, aisles, and stairwells at all times.
- Provide adequate lighting and signage at exits.
- Ensure self closing doors are operating at all times.
- Include a fire watch procedure (temporary measure) when a physical inspection finds that a fire alarm and/or sprinkler are not operational.
- Have a policy providing discipline for false alarms.
- Have a common meeting place outdoors some distance from the building, and take attendance.
- Have a real-time communication strategy and system, including Incident Command System (ICS) model with the fire department and law enforcement. See also Crisis Management under Business Continuity.
- Provide adequate number of exits.
- See also Students, Resident Advisors and Fire Safety in the beginning of the Property section.

Educational Institutions Risk Management Guide

Environmental management

Environmental issues and exposures may vary for educational institutions, from asbestos and lead to mold, oil storage, hazardous waste disposal and hazardous spills, among others. Regulations, codes and a number of agencies at the local, state and federal levels may be involved in managing the issues. In cases where properties may be donated to schools, diligence must be conducted to understand any associated environmental, pollution or liability issues. Qualified professionals should be used as appropriate.

Sustainability – “green” policies

Many schools are involved in environmental (“green”) sustainability and stewardship. The “green” movement involves an institution’s commitment to reduce its environmental footprint. Many schools are managing their operations through “green policies” and programs in efforts to be energy efficient and help reduce greenhouse gases believed to contribute to climate change. The U.S. Environmental Protection Agency, trade associations and states offer a number of tools and grants to help schools, universities and colleges in their efforts, including educating students and dorm residents on ways to participate.

Laundry services

Improperly maintained clothes dryers are a major cause of fire. Students and employees should keep lint trays free from lint. Maintenance personnel also should inspect and regularly clean hoses, vent systems and floors around clothes dryers.

Natural and man-made disasters

In addition to fire loss, educational institutions also are confronted with a business and property loss potential due to weather-related events, including natural disasters, and terrorism, such as bomb threats. Weather-related events span the range from freezing pipes and roof cave-ins to partial and total loss of buildings due to severe weather. Schools should have a written and practiced disaster/business continuity plan. See also Business Continuity section.

Premises security

From a property perspective, theft, burglaries and vandalism are major concerns for educational institutions. Targeted items include, among others, cars; tools; high-value items; such as computers and musical instruments; library collections; artwork; and bookstore items, including CDs, DVDs and computer software. Bathrooms, libraries, vehicle/school bus storage areas/yards and cash-heavy operations, such as bookstores, are particular targets for vandalism, especially graffiti. Loss control considerations include, but are not limited to:

- Access control, including a formal, documented key control and/or picture ID plan/system to various areas throughout the school or campus. Electromagnetic or keyless card operated locks on dorm rooms are commonplace and considered more protective.
- Closed circuit TV/security cameras and motion sensors, including in computer rooms.
- Retention of security tapes for at least six months.
- Hours posted and restrictions enforced for campus buildings. Restrict late-night access to dormitories to a main entrance that is monitored or operated only by residents’ keys or access cards.
- Magnetic detection devices at bookstore entrances and exits to deter shoplifting. Some schools ask students to leave book bags behind.
- Visitor/customer/vendor sign-in procedure, including accompaniment to visiting area, as appropriate.
- Limiting certain areas to authorized personnel only. Post signs regarding restricted areas.
- Good exterior lighting around building premises, parking lots, stadiums, grounds, residence halls and vehicle garage/storage areas.
- Periodic patrols of grounds and buildings, including inspections of timers, motion/sensor controls, bulbs.
- Well maintained/trimmed landscaping. Keep trees and shrubbery clear from windows and doorways.
- Locked doors and windows during off-hours to reduce theft of computers, medical supplies, and other valuables including library and art collections.
- Valuable items should be displayed in locked cases in highly visible areas. Security guards in these areas may help deter crime. When not on display, store valuables in a fireproof safe.
- Intrusion alarms at doors, windows, ventilator openings, roof hatches and areas where hazardous materials (gasoline, fertilizer, pesticides and chemicals) are housed.
- Use of fire-resistant, freestanding exterior library drop boxes to avoid portal for burning materials in a building.
- Storage sheds, trash containers located away from buildings.
- All buildings connected to a central station monitoring system;

Educational Institutions Risk Management Guide

- Notification procedure, including a campus “911” equivalent), to report thefts, burglaries, and acts of vandalism to security personnel, resident advisors or others. Also include a notification procedure to law enforcement.
- See also Jeanne Clery Campus Security Act under General Liability - Violence.

From a people management perspective, premises security also includes, but is not limited to:

- A security program for cash operations, including training cash operations personnel on responding to conflict/impending crime.
- An emergency notification and response/communication procedure in the event of suspicious activities/persons on the premises or the unfolding of a violent act.
- See also the subsection on Violence under General Liability and Business Continuity topics.

Most schools do not assume responsibility for student-owned property that is lost or stolen. Schools should address this in the student handbook and by letter to parents.

Property – building equipment and systems

Electrical systems, computers, telecommunications networks, air conditioning/refrigeration systems, including those for food service, boilers and pressure vessels with all their piping running through buildings and tunnels, power grids/generating equipment and other production equipment and systems are the lifeline of a school. These systems and equipment keep operational and administrative functions – from classrooms; libraries; laboratories; cafeterias; medical; athletic and livestock facilities; to communications (including transmission of critical messages during emergencies and crises); information/data management; living quarters and stadiums (even the scoreboard) – “up and running.” One can only imagine the confusion at a packed stadium and potential business loss, for instance, in the event of an electrical power outage. Equipment inspection and maintenance programs can help schools avoid breakdowns, malfunctions, outages and property damage (including, for instance, bursting water pipes in a library) and confusion in emergencies.

Loss control considerations include but are not limited to:

- Use only operators trained and qualified to operate, inspect, test and maintain equipment, including HVAC systems.

- Inspect, clean, test and maintain equipment and components daily, in accordance with the manufacturer’s instructions.
- Daily attention can help identify potential causes of failure, including, but not limited to cracks, foreign objects, fatigue and wear.
- Verify that all controls and safety devices are installed and tested according to the manufacturers’ requirements.
- Install electrical surge protection to prevent damage to electronic components, computers and communications systems.
- Perform infrared thermographic surveys on all major electrical panels, motors, transformers and mechanical rotating equipment annually to identify hot spots and make repairs before a breakdown occurs.
- Operate, inspect and maintain boilers, pressure vessels, chillers and refrigeration equipment in laboratories and kitchens according to manufacturers’ and jurisdictional requirements to ensure safe operation and proper temperature and humidity.
- Maintain operating log sheets for equipment, such as boilers and chillers.
- Conduct transformer oil testing, ground grid testing and underground cable testing on power substations and distribution systems.
- Perform vibration analysis on large rotating equipment on a regular basis to monitor condition and identify trends.
- Have a business continuity plan, including advance arrangements with other facilities to hold classes and house students.
- See also Business Continuity – Building Equipment and Systems Continuity.

Employee safety and health

Workers compensation

The potential for occupational injury and disease in the educational institutional setting will vary depending on its operations. Many educational institutions have a wide variety of professional and nonprofessional positions, from teaching staff, guidance counselors, librarians, psychologists, healthcare professionals and campus security to maintenance, administrative and food services employees and drivers. Some schools also may have volunteers and resident assistants/graduates who perform work in exchange for some form of compensation. Each

Educational Institutions Risk Management Guide

position has its own set of exposures as well as common exposures shared by all. Slips, trips and falls and back injuries are common across all level of schools. Increasingly important is training in conflict resolution for everyone, including resident/student assistants. The range of job positions and work-related exposures includes, but is not limited to:

- Maintenance personnel involved in the handling and/or moving of machinery, equipment, furniture, shelving, trash collection and various activities using ladders, trolleys, automated man lifts, scaffolds – exposures to falls, struck by objects/equipment, cuts, bruises and back injuries.
- Personnel who lift or move objects or furniture or are involved in repetitive motion tasks, such as data entry/typing – ergonomic-related exposures, including sprains, strains and injuries of the back, wrists.
 - Personnel involved in the welding and cutting operations – exposures to burns, eye damage, and occupational disease.
 - Maintenance/grounds and laboratory staff involved in handling chemicals (including solvents, pesticides) – exposures to respiratory and dermatitis issues.
 - Teaching staff – exposure to stress, which may result in hypertension and cardiovascular disease.
 - Teaching staff, security, resident advisors and others – assaults and injuries sustained related to violence and/or attempting to moderate hostile/disruptive student behavior. Security personnel also may be assaulted when investigating suspected crime.
 - Food services workers, science teachers and lab staff – exposures to burns, scalding, cuts, and chemical and noise exposures;
 - Cash operation personnel, such as in bookstores and campus pubs – exposures to burglary-associated violence;
 - Physical education/athletic staff, medical personnel and emergency response or security emergency medical teams – exposure to bloodborne pathogens, shoulders and arms, as well as “struck-by” injuries.
 - Security personnel and transportation drivers – risk of injury associated with vehicle accidents.

Student teaching and internships can create additional exposures for schools. State laws vary with regard to whether or not this may be considered workers compensation and/or who assumes liability. Consult with legal counsel.

Good safety management and loss control considerations include, but are not limited to:

Safety management

Safety begins with a solid safety management philosophy and foundation that includes the school’s safety vision and commitment and attitude/culture around safety and security by all level of personnel, starting at the top.

- Implement a safety program, including employee participation and feedback, management accountability, safety program evaluation and a process for continuous improvement. This should be in writing and communicated to all.
- Hold new hire safety orientation, as well as refresher training, for full-time, part-time and temporary employees.
- Include general topics, such as emergency evacuation, good housekeeping, personal protective equipment (PPE) and ergonomic principles.
- Train employees on the hazards and safe work practices related to their specific jobs. Training should be interactive and not just “read and sign.”
- Use temporary employees only in the capacity for which they are trained.
- Have a contractor safe work agreement for on-site contracted services.
- Conduct hazard communication training and make MSDSs (material safety data sheets) readily accessible.
- Implement a safety committee team. Train members to help with hazard analysis and accident investigation.
- Have an accident investigation process, including action plans for correction.
- Communicate and enforce a drug-free workplace.

A major component of an effective safety management program is employee involvement – not just in the exercising of safe behaviors but also in the development of the safety program. Suggestion boxes, open door policies to share safety ideas and concerns, and safety committees are a few forums for involvement. Effective safety committees are comprised of management and employee (including faculty) members from various departments throughout the school. They may include students and residential advisors.

In addition to an overarching safety management program, safety programs should also target specific exposures. Loss

Educational Institutions Risk Management Guide

leaders for educational institutions include slips, trips and falls (to the same level); back injuries/lifting and other strains/cumulative injuries; falls from a different level; burns/cuts; equipment-related injuries, including struck by objects; vehicle collisions; occupational dermatitis, assaults and stress. Loss control considerations include, but are not limited to:

- **Bloodborne Pathogens Program**, particularly for those who have occupational exposure to blood;
- **Conflict resolution training** and a zero-tolerance violence policy. Regarding security personnel, detention and arrest powers vary by state and/or municipality. Schools should have a procedure and include law enforcement.
- **Driver safety program**. See Driver and Vehicle Safety section.
- **Drug free workplace** policies, including drug testing. For commercial drivers, drug and alcohol testing is required by U.S. Department of Transportation (DOT) regulations.
- **Ergonomic programs**. This includes manual material lifting/handling, hand tool safety and office ergonomics to help reduce improper lifting, repetition and force that can contribute to musculoskeletal disorders.
- **Fall (from height) protection** program – falls from heights to lower level. This includes for ladders, catwalks, scaffolds and automated man lifts, among others. The Occupational Safety and Health Administration (OSHA) has cited educational institutes for lack of proper fall protection.
- **First aid program, including Automated External Defibrillator (AED) program**. Your automated defibrillator program and training program must be overseen by a medical professional. School nurses, coaches, athletic directors, physical education staff and emergency responders who administer must take an approved Public Access Defibrillation (PAD) certification course. Know your state law on administration of AED programs, as laws and immunities vary. Consult with legal counsel.
- **Food services/kitchen safety**, including safe practices around cutting, equipment with moving parts, hot equipment and appliances, and hygiene practices for safe food handling and reduction of disease transmission.
- **Hazard Communication (HAZCOM) and Chemical Safety Programs**. This should include safe handling, storage and dispensing practices for chemicals, solvents, pesticides, and flammable/combustible hazards, including PPE, as appropriate.
- **Laboratory safety**, including a Chemical Hygiene Plan, as well as HAZCOM and PPE programs. Some personnel may have allergies to chemical or lab animal hair/urine. Bites also are a concern in animal laboratories.
- **Medical programs** particularly for physical education staff. This includes periodic medical exams, proper PPE when participating in certain sports, and training in emergency first aid for certain sport injuries.
- **Personal Protective Equipment (PPE) Program**, particularly where paints, printing inks, solvents, pesticides, chemicals are present. These can contribute to skin irritations, dermatitis, chemical burns, eye irritation and respiratory problems. PPE also is important when working at heights or performing welding/cutting operations. OSHA compliance programs include eye, face, hand and **respiratory protection**. Include wash stations, as appropriate. Proper ventilation can help reduce exposures that can result in respiratory problems.
- **Slips, trips and fall (to same level) safety**. Among other things, your program should target walking surface conditions/maintenance, lighting, spill response and good housekeeping for interior premises and outdoor grounds, including parking lots, parks and athletic fields/arenas.
- **Stress management**. Stress reduction, wellness programs particularly for teaching staff.
- **Welding safety**, including proper PPE and safe operating practices, including compliance with OSHA's hexavalent chromium standard, where stainless steel is involved.

Additionally, top citations issued to schools by OSHA for violations include:

- Asbestos Management. K-12.
- Lead management. Colleges and universities.
- Hand safety. K-12, particularly maintenance, lab and food services personnel.
- Lockout/tagout and machine safe guarding. K-12.
- Mechanical power transmission. K-12.
- Portable fire extinguishers. K-12.
- Respiratory Protection. Colleges and universities.
- Sanitation safety practices. Colleges and universities.

Educational Institutions Risk Management Guide

Colleges and universities may have off-campus student teachers and/or paid and unpaid internships. State laws vary on liability for injuries and illnesses in these capacities. Injuries can fall under a school's workers compensation program or general liability program.

Accident investigation

The purpose of an accident investigation is to identify and understand the root causes of the accident and make safety improvements to avoid recurrence. The root cause of an accident generally is a combination of people behaviors, property/equipment, conditions in the environment and work process. Investigating the role of each of these elements may help schools understand why the accident happened and develop corrective actions to minimize recurrence. A good accident investigation should include five steps: securing the scene; conducting the investigation including thorough inspection and interviews; analyzing the information gathered, including past loss data to determine if there are trends; developing and implementing corrective action; and following up/measuring the effectiveness of the correction action, including making additional adjustments, as appropriate. Good accident investigations are opportunities for improvement and quality assurance.

Post-injury management

In the event of an employee injury, the most effective way to reduce loss costs is to help shorten the duration of time away from work through a good post-injury management program. The program keeps the employee's welfare at the forefront and the employee connected to the workplace through routine communications and return to work, including transitional duty. Studies show that many injured employees can return to work sooner than they do. A good return-to-work program can help shorten the duration away from the job while allowing the employee to continue to be productive.

- Have a prompt injury reporting procedure, including to the supervisor/management and claim representative.
- If medical treatment is needed, accompany the employee to a provider. Where possible, use a preferred provider network.
- Have a designated injury care coordinator who can monitor progress and serve as an advocate in answering employee questions about workers compensation and their return.
- Have a return-to-work policy and job bank. For some positions, schools use cross department job banks, where the focus is to leverage the skills or abilities of the injured employee.

General liability (safety of the public)

The safety of non-employees and your general liability exposure pose a significant challenge to schools – from sporting events, concerts, and recreational facilities, to field trips, student exchange programs, information confidentiality, health management, activities in industrial shops and science and animal laboratories, daycare services, use of school facilities by outside organizations, events where alcohol may be served; ATMs, and food safety in school cafeterias, among others. Fire and violent incidents from bullying to manslaughter also present threats to life safety.

Increasingly, school administrators are faced with social/interpersonal exposures, including student violence and assaults (bullying, hazing, date rape, sexual harassment, molestation, hate crimes, manslaughter), depression and suicides. Campus crimes and third-party litigation for assaults on campuses have been on the rise, with courts ruling that students should expect safety and holding schools responsible. Security, crisis management and student mental health are cogent issues and have increased the focus on security and safety officers [Department of Public Safety]; anti-crime policies; crisis management, including rapid communications and response coordination; and the need to better educate on, identify and provide access to mental health resources. Mental health management has raised its own set of issues particularly around the management of confidential information and when confidential information may be shared in light of privacy laws, including the Family Education Rights and Privacy Act (FERPA). Loss control considerations include, but are not limited to:

Alcohol and drug policies – students

Studies report that students who overindulge in alcohol and/or drugs are more likely to be involved in arson and fatal fires, and in incidents of violence. Some reports claim that student substance abusers are more likely to commit acts of violence than those with emotional/social issues. A school's alcohol and drug policies should extend to all, including Greek and other campus organizations. Alcohol policies are designed to limit and/or ban liquor at campus events and student parties, and enforce discipline around serving minors. Schools vary on what is permitted. Some schools permit alcohol only at "designated special events" with the approval of the president; require residential halls, including Greek housing, to obtain permits from the college when alcohol will be served; ban advertisements proclaiming alcohol will be available at parties; require the hiring of qualified bartenders; and require security guards when parties exceed a number of attendees. In addition to alcohol and drug policies, many advocate student education to help correct misperceptions about peer drinking.

Educational Institutions Risk Management Guide

According to the US ED's alcohol and violence prevention Center, a small "but influential subpopulation" of students creates the impression that drinking is a campus social norm, when, in fact, it is not. Many schools make counseling services and/or student peer advisors available to assist students with substance abuse issues. See also Risk Management for Student Organizations in this section.

Alcohol policies – employer host/liquor liability

Lawsuits for liquor liability, stronger drunken driving laws and dram shop laws have increased since the early 1990s. The consequence of an accident connected to the consumption of alcoholic beverages no longer falls solely on establishments who sell and/or serve the alcohol. It also can fall on a social "host" where alcohol is being served, including employers. Schools should understand their liability when alcohol is served at events. Some colleges require event planners, students and staff who coordinate social functions to attend training on responsible alcohol service. Additional loss control considerations include, but are not limited to: serving high protein or starch foods to absorb the alcohol; making non-alcoholic beverages available; hiring a bartender who has completed a server intervention program; engaging the presence of security personnel; and providing transportation to participants who overindulge.

Contractor/vendor/visitor risk management

Due to the number of outside contractors, vendors, parents and visitors that may be present in or on the grounds of a school or campus, schools should have sign-in procedures and access controls to help monitor the public presence. Personal protective equipment, such as safety glasses or hard hats, also may be required in some circumstances. Additionally, where schools contract for services, including transportation and security, or contract for products, such as food products, contractual risk transfer programs should be in place, including hold-harmless agreements and third-party certificates of insurance, indemnifying you or adding you to their policy to help remove you from claims for damage or harm caused by third parties. The program should be reviewed at least annually to ensure current certificates, where appropriate.

Event/crowd management

In addition to other life safety measures mentioned in this guide, crowd/event management is very important where schools host large events, including athletics, concerts and theatrics, and graduation. Observation of all occupancy codes, good housekeeping and lighting, including exit signage to provide ease of exiting and egress, the use of volunteers and security guards to patrol and participate in organized exiting, and informing audiences of exits and

exiting procedures are important considerations to help minimize any injury when leaving events, particularly in emergency exiting. Standing-room-only should be banned, as it contributes to overcrowding and can impede efficient exiting and evacuation.

Food safety

Students, visitors and others who consume foods that are prepared and/or served by the college can be at risk of consuming contaminated foods that could result in food borne illnesses, such as salmonella and e-coli poisoning. Good hygiene/food handling, preparation and storage (time and temperature) practices by food services personnel are key to food safety. Schools also should use risk transfer programs to protect against liability in the event vendors supply contaminated foods.

Health management

From food borne illness to infectious/contagious disease, dispensing of medical treatment and responding to medical emergencies, health management and planning are important to a school's overall loss control programs. Loss control considerations include, but are not limited to:

Contagious/infectious diseases. Spinal meningitis, tuberculosis and influenza (including pandemic flu) can be contagious and are considered high health risks for students, staff and the public. Schools should have plans for managing serious illnesses to prevent the spread of illness among students.

First Aid, Including Automated External Defibrillators (AEDs). First responders, medical personnel, and athletic coaches are among school personnel who should be trained in first aid. Many schools also provide certified AED training. AED programs are highly regulated and may differ by state regarding requirements and immunities; consult with legal counsel. School administrators should be familiar with federal and state laws. Emergency medical contacts should be available for all students and kept as part of your confidential recordkeeping procedure. Medical personnel also should understand treatment and dispensation guidelines.

Recreational activities/athletic programs

Educational Institutions hold various special program and athletic activities that could create risk of injury to students and other third parties. These may include varsity sports, summer camps, rock climbing, water craft, and activities that include the use of playgrounds, swimming pools and bleachers. Programs should be run by trained personnel. Swimming pools, bleachers, playground and other equipment and appliances should be routinely inspected, well maintained and repaired or replaced promptly,

Educational Institutions Risk Management Guide

including being certified annually by appropriate agencies/organizations. Safety rules should be posted and communicated to help everyone understand safe practices in using equipment or facilities. The program also should include immediate first aid and accident investigation procedures by trained staff. Student athletes should participate in medical exams and drug testing. Road and overnight trips should have parental permission slips and chaperones, as appropriate.

Risk management for student organizations

A large percentage of fatal fires occur in Greek and off-campus housing. Students who live in/operate Greek housing or other campus organizations should attend risk management and fire/life safety orientation. Texas has passed HB 2639 requiring post secondary student organizations to offer risk management programs. It would require officers and pledges of fraternities and sororities to attend a risk management seminar and offer the class to other registered student organizations. Penalties for alcohol and drug possession or use, information about parties and events, fire and safety issues, and sexual abuse are also included.

Sexual assault/harassment

Schools must have a well written and communicated sexual assault/harassment policy. The policy should include reporting, medical and social services resources, investigation, and resolution, including a disciplinary and/or judicial process.

See Violence/Social Disruption – Jeanne Clery Campus Security Act below

See also Professional Liability - Sexual Harassment

Slips, trips and falls

Slip, trip and fall injuries can result in employees filing workers compensation claims or third parties filing general liability claims holding you responsible for the injury. See Employee Safety and Health - Slips, Trips and Falls Safety.

Violence/social disruption and prevention

Educational institutions are exposed to a number of social or interpersonal risks including bullying, assaults, dating violence, stalking, hate crimes, molestation [particularly where younger children or daycare programs are present], and other forms of disruptive and at-risk/troubled student behavior including depression and suicide. Alcohol and drugs have been associated with acts of violence to others and self, as well as with fires. Student mental health plays an important role in an educational institution's ability to provide and maximize student learning in the context of a safe and healthy environment. Identifying student mental health needs and collaborating with, and making available,

campus and community support resources that can help at-risk/troubled youth access services important to the fostering of healthy social, problem solving and other skills and behaviors that, in turn, can help reduce violent behaviors and thoughts against others and self.

Experts suggest that schools, communities, law enforcement, parents, students and mental health professionals work together to develop prevention and response strategies, including helping to identify troubled students and making appropriate support services available as part of campus safety, security and crisis management planning. Crisis planning and emergency management continue to evolve, with focus on expanded use of personal communication technologies and integrated communication, coordination and collaboration across campus and with community agencies to enhance real-time incident response. The National Incident Command System ("ICS") provides a model for emergency/crisis response for schools. See also Business Continuity -Violence.

Loss control considerations include, but are not limited to:

Jeanne Clery Campus Security Act

The Jeanne Clery Campus Security and Campus Statistics Disclosure Act (originally the Student Right to Know and Campus Security Act of 1990) was named in memory of 19-year-old Jeanne Clery who was raped and murdered while asleep in her residence hall at Lehigh University. The Act requires higher education institutions that seek or receive Federal funding to keep campus crime records, give timely notice of crimes that present a potential threat to students, employees and the community and disseminate crime reports to the campus community and the US ED annually. Reports are made on several major crime categories, whether or not prosecuted, and include: criminal homicide, sex offenses [forcible and non-forcible], robbery, aggravated assault, hate crimes (race, gender, religion, sex orientation, ethnicity and disability), burglary, arson and motor vehicle theft. Hate crimes, sexual assaults, burglaries and car thefts have seen a rise in reporting. Schools also must report violations/arrests related to alcohol, drug abuse and weapon violations. Alcohol-related crimes and liquor law violations occurred most frequently on college campuses. While there is no federal mandatory K-12 school crime reporting and tracking law, a number of states have created legislation to require local school districts to report school crimes to state departments of education and/or other state authorities. Schools can work with local law enforcement to improve and support student safety, a high priority for parents.

The Clery Act also requires higher educational institutions to inform the public of campus security policies. In 2000, the Act was amended to reflect Megan's Law and the right of

Educational Institutions Risk Management Guide

students to know how to access information on registered sexual offenders. The Act intends to provide students and families with accurate crime information so they can make informed decisions about college choices. A campus security program requires campus administrators to consider a number of factors in implementing an effective program, including:

- Communicating crime prevention measures and tips with students, including through orientation, student handbooks and training.
- Implementing a record-keeping system to track and report criminal activity and arrests.
- Conducting campus security surveys and patrols, including of residence living.
- Providing security equipment (closed circuit) in parking lots, campus grounds, residence quarters and access control systems for restricted areas and student housing.
- Organizing and training a qualified campus security department.
 - > Uniformed security personnel and volunteer student patrols and escorts (without law enforcement/arrest authority) should be trained and/or certified. Emphasis should be placed on confrontation avoidance and use of two-way communication with police or uniformed campus security for response.
 - > Uniformed security personnel with arrest authority should have training comparable to training requirements of local law enforcement.
 - > Some schools hire licensed community law enforcement officers in place of or in addition to security personnel. Where crime is a major campus and community issue, some schools hire a law enforcement/security professional to head the campus security department. [International Association of Campus Law Enforcement Administrators (IACLEA)].
- Campus security should be on a 911 system or have a phone number that is easy to remember.
- The school should monitor campus and community crime activity and comply with the Jeanne Clery Campus Security Act reporting requirements.
- Student orientation should include information on campus and community crime activity, personal safety training, date rape, campus crime, victim support services, and crime reporting procedures. Improving student awareness of safety issues can help students protect themselves as well as create a peer environment that will not tolerate abusive behavior.
- Reports of sexual harassment, sexual molestation, rape or other crimes must be investigated immediately by persons specifically trained and/or certified in conducting such investigations. All complaints, both formal and informal, should be well documented.
- Child abuse should be reported to proper authorities.
- Zero tolerance for violence, drunkenness, drugs, and crime should be a campus policy. It should be publicized at the beginning of each school term.
- See Property/Life Safety - Premises Security.
- See also Professional Liability - Sexual Harassment.

Violence and threat assessments: safe school initiative

In 2002, the Secret Service (SS), in collaboration with the US ED, completed The Safe School Initiative (SSI), a study of school shootings and other school-based attacks. The goal of the study was to develop information about pre-attack behaviors, to help identify and inform on these behaviors to help prevent school-based attacks. The study found that school shootings are rarely impulsive acts; rather, they are planned in advance. In addition, almost every attacker had engaged in pre-incident behavior that “seriously” concerned one or more adults who were aware that a violent incident could likely take place but did not alert an adult. The study also revealed that there is no “profile” of a school shooter; instead, student perpetrators differed from one another in many ways. The findings suggested that some school attacks may be preventable, and that students play an important role in prevention efforts. As a consequence, the SS and the US ED provide guidance to help schools manage threatening situations and create safe school climates.

The US ED also offers many resources to address “safe and drug-free school” as part of its “Lead and Manage My School” Website, including workshops and online tools to help in violence prevention and crisis management.

Violence and the Virginia Tech Review Panel Report

In the aftermath of the April 2007 student killings at Virginia Tech, Virginia Governor Timothy Kaine charged a panel of professionals to investigate the incident, identify the issues and provide recommendations that would help deter future incidents of violence and enhance college safety and security. The report, released in August 2007, laid out

Educational Institutions Risk Management Guide

several findings and recommendations, including (as excerpted):

- **Critical information-sharing faces substantial obstacles.** Educational officials, healthcare providers, law enforcement and others are confused/not fully informed about when they can share critical information on persons likely to be a danger to self or others, which may chill legitimate information sharing. Education, clarification and legislation need to help allow critical information sharing.
- Accurate and complete information on individuals prohibited from possessing firearms is essential to keep guns out of the wrong hands. State laws and practices need to uniformly ensure that information on persons restricted from firearm possess be captured and available in the National Instant Criminal Background Check System.
- **Improved awareness and communication are key to prevention.** Parents, teachers, and students must learn to recognize warning signs of troubled/at-risk students and encourage those who need help to seek it.
- **It is critical to get people with mental illness the services they need.** This will require effective coordination of community service providers who are sensitive to safety, privacy and the provision of care.
- **We have to be better at doing what we know how to do.** For the states and communities that have adopted programs, including emergency preparedness and violence prevention, programs must be implemented through practice and effective communication.

Guidance from legal counsel should be sought when developing policy or programs around these recommendations primarily to ensure against privacy and confidentiality breaches.

Mental health

Schools, communities, law enforcement, parents, students and mental health professionals are seeking ways to work together to develop integrated education, prevention and response strategies for student mental health needs and make available access to support services as an important chapter in campus safety. This includes students with behaviors considered “at risk,” such as depression, suicidal tendencies, anti-social behavior and loners. Strategies include a broad health-promotion approach and focus on halting the development or progression of risk factors across home, school, and peer contexts. Successful universal interventions feature efforts to build individual

strengths in social and problem-solving skills, initiated early in life.

Student travel/study abroad

Students who study or travel abroad should have medical examinations and obtain, as appropriate to the country and their medical status, vaccinations. Additionally, the school should be aware of any U.S. Department of State alerts about any of the countries or locations where students will be traveling. Students should be aware of safety and health cautions and practices when traveling or studying abroad, including what to do or who to contact in the event of a health or political issue. Additionally, the school should be clear with students as to whether any injury or illness falls under the school’s health plan, the parent’s/student’s health plan or the school’s workers compensation coverage. In some states, this may be stipulated to the school. International travel safety information for students is available on the U.S. Department of State Website for students.

Student - Foreign Student Exchange Program

The Student and Exchange Visitor Program (SEVP) tracks and monitors schools and exchange students who participate in the U.S. education system. It provides information to various government organizations with an interest in foreign students and their dependents to ensure that only legitimate foreign students or exchange visitors gain entry to the United States.

Professional/management liability

Schools and school administrators can be at risk for a number of management/professional liability accusations thought to demonstrate negligence, misjudgment or inappropriate behavior on the part of school personnel. This will vary among institutions depending on the school’s independence or role in making decisions and judgments. Exposures include, but are not limited to charges of:

- Discriminatory admission practices.
- Failure to educate.
- Negligent hiring and supervision practices (including claims of sexual molestation and harassment).
- Wrongful termination.
- Libel, slander, defamation.
- Constitutional violations (freedom of speech), illegal search and seizure.
- Malpractice in administering medical treatment or counseling.

Educational Institutions Risk Management Guide

- Failure to prevent suicides or violence, particularly where these behaviors are known.
- Inadequate, inaccurate, inappropriate student records management and privacy protections [Health Insurance.
- Portability and Accountability Act (HIPAA) and FERPA].
- Failure to grant tenure properly.
- Breach of fiduciary responsibility.
- Misrepresentations on or misuse of information via your Website (Cyber liability).

Many of these exposures call for equitable policies and non-disparate administration of policies, such as admission practices, terms of employment and the granting of tenure. Privacy and confidentiality of information must be well understood including when it is appropriate, in accordance with laws and regulations, to share information. All information should be accurate and maintained in accordance with retention policies. Many resources are available from professional and school associations and the US ED to help schools develop programs to help identify and provide resources to at-risk students with potentially destructive/self-destructive behaviors and to schools. See also General Liability - Violence/Social Disruption.

Cyber liability

Post secondary schools are vulnerable to cyber attacks, information theft and misuse of networks by students, staff and other personnel. In the days following the 2007 Virginia Tech tragedy, spammers and hackers infected the university's computers and set up fraudulent victim donation schemes. As part of information security, schools should have strategies to prevent cyber attacks and security breaches. Programs also should be in place to prevent the misuse and/or misrepresentation of data transmitted via the school's networks, including via email and over their Website. In addition to theft of confidential and business information, exposures may include defamation, harassment, obscenity, copyright infringements, and mis-marketing the school. Staff, students and others should be aware of the legitimate and unacceptable use of the networks and disciplinary consequences. National leaders of higher education have endorsed a five-part framework for cyber security action as part of the [National Strategy to Secure Cyberspace](#). Schools should consult legal counsel on monitoring and cyber liability issues. See also Business Continuity - Information/Computer Security.

Employment practices

Educational institutions must exercise great diligence in their screening and hiring practices for all positions – from

the janitor to the adjunct professor – to help hire employees and volunteers who can be trusted in their interactions with younger populations and help school administration avoid claims of negligent hiring and/or supervision. This is particularly a concern where younger students and daycare services are present, where molestation is a potential exposure. It also is true where students may be subjected to quid pro quo (a favor to a student, such as a good grade, in return for a sexual favor) or a hostile, uncomfortable environment where behaviors can lead to allegations of sexual harassment. Among other things, selection and hiring practices should include background checks, including criminal background checks of all state databases and checks with the national database of sexual offenders. Several states require background checks of students entering education and healthcare professions. Drug testing policies vary. In general, drug screening is conducted for safety sensitive positions and for commercial drivers. State laws may vary. Consult with legal counsel.

Sexual assault/harassment

Schools should have a sexual harassment policy statement, communications and training for all staff, employees and students. Reports of sexual harassment, sexual molestation, rape or other crimes that involve acts or alleged acts must be investigated immediately by persons specifically trained and/or certified in conducting such investigations. The investigation should include separate interviews of accused, accuser and any witnesses. Title IX of the Education Amendments of 1972 requires that once colleges and universities “know or reasonably should know of possible sexual harassment of students,” it must take “immediate and appropriate steps to investigate or otherwise determine what occurred and take prompt and effective steps reasonably calculated to end any harassment and eliminate a hostile environment if one has been created” regardless of whether or not the college has been asked to act by the student alleging harassment. Failure to do so can result in a cause of action, including an administrative procedure, through the US ED. The Clery Act also sets forth a number of requirements. Child abuse also must be reported to proper authorities. All complaints, both formal and informal, should be well documented, since legal action may be involved.

Driver and vehicle safety

Vehicle transportation can be a serious liability for educational institutions, particularly where the institution owns its own vehicles and operates several different types, including shuttle buses, motor coaches, 15-passenger vans, ambulances or EMS vehicles, security vehicles or tow trucks. Bad weather, uneven roads, nighttime driving, long distance field trips, traffic and driver fatigue are among

Educational Institutions Risk Management Guide

some of the factors that can increase the accident potential, often resulting in multiple injuries. Student behaviors – both celebratory and disruptive – can distract drivers and increase the accident potential.

15-passenger vans and other large vehicles, such as motor coaches, can pose a unique set of handling characteristics and challenges. Drivers should be well-trained in operating these vehicles. In cases where the vehicle falls under U.S. Department of Transportation (DOT) regulations, drivers must have commercial vehicle driver qualifications and licenses; and school administration must exercise DOT compliance, including alcohol and drug testing. Drivers of these vehicles also should be trained in passenger evacuation, including for students with special needs, as well as managing disruptive behaviors. Students also should know appropriate passenger safety and evacuation practices. Additionally, institutions that house their own vehicle maintenance facilities must ensure that qualified mechanics are retained.

Injuries from motor vehicle accidents can potentially happen to employees/staff, students and the general public. In the event of a vehicle accident, there also may be multiple injuries and property damage to one or more vehicles. Employees who drive their own vehicles in the scope of their work can present an added financial risk to your school. In the event of a serious accident involving the public, you could be faced with out-of-pocket punitive damages if a court determines you were “negligent” in hiring or entrusting a vehicle to an unsafe, unqualified driver.

The use of youthful drivers/students to help transport students and/or run errands and/or the use of parent volunteers for road trips also can increase the exposure. This also raises the issue of non-owned vehicle use where the school does not own the vehicle and an accident takes place, as well as personal use of vehicles owned by the school but given/lent to professors or other staff.

Schools also can have exposure to theft and in-transit property damage related to the transporting of valuable art work or musical instruments. Drivers should be trained in cargo securement and safe handling practices in these instances.

Driver selection, qualification and training in specific vehicle handling and well as safety rules, a good vehicle maintenance program, and a risk transfer program, as appropriate, are central to helping schools reduce accidents, injuries and vehicle damage to its own employees, students and the general public.

- Loss control considerations include, but are not limited to:

- Implement a driver selection and hiring procedure for company drivers, including those who use their own cars in the scope of their work. This includes valid driver’s license verification, motor vehicle records check and road testing, including of commercial driver license holders.
- Where appropriate, follow DOT regulations.
- Implement a fleet safety program covering defensive driving/accident avoidance and vehicle inspection and maintenance. Hold refresher training every three years. Document all driver training.
- Provide specific training on 15-passenger vans, motor coaches, security vehicles, tow trucks and other vehicles requiring special maneuver/handling safe practices. Include evacuation training and drills, including managing students with special needs.
- Provide defensive driver training to all new hires before operating a vehicle.
- Require driver remedial training, up to and including a disciplinary procedure, for drivers who have preventable accidents.
- Require drivers of non-owned vehicles to produce proof of insurance with adequate liability limits.
- Implement a ride-along assessment/coaching program.
- Require designated driver helpers to assist the driver when parking and with navigation and passenger comfort.
- Train appropriate personnel in cargo securement and trailer connection safety.
- Train appropriate personnel in loading/offloading goods and passenger emergency exiting.
- Include a cell phone policy mandating no use of cell phones while vehicles are in motion. Employees should pull over to a safe location to retrieve messages and return calls.
- Have an accident reporting and investigation procedure. Equip glove compartments with an accident form that can be completed “on the spot” to get facts about the accident.
- Have a routine vehicle inspection program managed by your mechanic or designated garage. This includes inspection of vehicles non-owned by the institution but used by employees in the scope of work.

Educational Institutions Risk Management Guide

Other considerations

Some schools may use for-hire passenger charter services. In such cases:

- Require for-hire passenger charter services to provide proof of insurance/certificates of insurance. Consult your agent for appropriate limits.
- Restrict the use of personal use or non owned vehicles and/or require certificates of insurance from operators.

Disaster management – property and equipment

According to the Federal Emergency Management Agency (FEMA), fires and natural disasters have affected schools with high frequency in the past decade. Any interruption to normal operations – electricity, water, telecommunications, data and data systems – could be costly, resulting in a significant impact on its operations and on people, whether caused by fire, water or weather-related events, or due to breakdowns, malfunctions or damage to equipment and computer systems. For larger institutions, interruptions in operations could be significant where medical facilities/hospitals, large library and art/museum collections, livestock and residence living are involved.

Note: Pandemic flu, terrorism and social violence also can cause interruption and require alternative plans. [See Violence/Social Disruption in this section.] Any event that results in a widespread impact or interruption to facilities, infrastructure, operations and people can result in significant losses to property and people and the school's financial stability particularly if it results in faculty and student departures or transfers. Hurricane Katrina (2005) especially taught schools new lessons. It forced full school closures longer than any on record and caused devastation to a whole region of schools, colleges and universities. Katrina taught schools that, like other businesses, they need to have business continuity plans as part of their disaster management planning, in the event of worst-case scenarios or extended shutdowns.

Loss control considerations consider building designs and administrative strategies including, but not limited to:

- A written and well-practiced plan. Everyone should have access to it.
- A team designated with roles and responsibilities to help carry out the plan, including response and recovery.
- A vulnerability assessment and prioritization to determine which areas need to be addressed, including continuous review and reassessment.
- Implementation of mitigation strategies.
- Assurance of continuous communications by way of a

variety of vehicles, including satellite phones with pre-programmed numbers. In Hurricane Katrina, telephones and cell phones became nonfunctional.

- Contingencies for alternative classrooms, books, supplies and housing, where possible. Some schools use distance learning technologies.
- Information/data management and storage alternatives, including backup, duplications and off-site storage
- Response and recovery plans, including around safety, communications with students, staff, families and local agencies, as appropriate.
- Chain of command with a command center.

Many educational institutions also are including construction/design considerations in their disaster planning. [FEMA 443 Building A Disaster-Resistant University](#) provides a “how-to” guide and six examples of universities and colleges that have worked to become more disaster-resistant. The guide provides information for institutions just getting started, as well as ideas and suggestions for institutions that have already started disaster-resistant plans.

A good continuity plan can help companies assess and plan for significant business operation vulnerabilities whether from natural disasters, fires or other incidents or events that can lead to business interruption. Examples of other events include malfunctions or breakdown of critical equipment and corruption or loss of electronic data or computers/networks. Additional loss considerations include, but are not limited to:

Building equipment and systems continuity

- Purchase spare parts for critical equipment, per manufacturers' lists of recommended spare parts; and annually update quotes for replacement parts and equipment with guaranteed delivery timeframes.
- Store and maintain replacement parts and new parts as recommended by the manufacturers.
- Have a service provider identified or pre-arranged who can provide quick turnaround for repairs or replacement in the event of a breakdown or need for a critical component.
- Have advance, written arrangements with other institutions/companies with compatible equipment so you can handle mail, and/or the needs of your print shop or medical facilities.
- Review your insurance contracts and contracts with vendors for business interruption considerations (pricing, availability). This also should include assurance that vendors/suppliers also have business continuity plans to meet your needs.

Educational Institutions Risk Management Guide

- Annually update the availability and cost of rental equipment to maintain a required level of service during the repair/replacement of damaged equipment.

Information/computer security

Educational institutions may process and store volumes of information daily. A fair amount of information transacts by email or through the school's Website. Data, both hard copy documents and electronic, has unique information management and security challenges and should be part of an information security program, including, but not limited to:

- Protect your computer networks and data with firewalls and virus and spam protection software programs.
- Encrypt personal information where possible.
- Establish a plan and process to comply with security breach notification legislation in the event of a breach of confidential student information. State laws vary and may even vary for in-state versus out-of-state students.
- Store valuable and confidential documentation off-premises in a fire-resistant, approved safe.
- Require acknowledgement by users that the network is for legitimate school-related activities only.
- Restrict computer and record storage rooms to authorized personnel only.
- Back up computer data/duplicate records daily and store off-site.
- Inspect and service computers regularly.
- Mark all computers with identification numbers for tracking purposes in the event of theft.
- Contract with a service that allows continuous computer operations in the event of a loss to data processing equipment.
 - > Have alternative arrangements for registration and application submission.
 - > For data intensive/administrative operations, have arrangements for an alternative location.

The specific protection features of a computer facility can include automatic smoke/heat sensors, automatic fire suppression, fire resistive construction, and electric power management. The extent needed varies according to the importance of the uninterrupted operation and value of the equipment. Emergency operating procedures for computer operations should include:

- Assign and periodically check specific responsibilities of the computer system personnel.
- Post emergency instructions in appropriate locations to cover fire, smoke, water, loss of electric power, improper HVAC.
- Train and drill computer system personnel on emergency procedures.
- See also Professional Liability - Cyber Liability.

Violence/social disruption – emergency and crisis management

In addition to emergency planning for natural disasters – where property and equipment are a major driving focus for business continuity – schools must be able to manage emergencies and crises related to incidents of “social disaster,” i.e., violence and terrorism – where people are the targets of the disaster. The criticality of an effective “social disaster” crisis management plan and its execution are at the forefront of every school administrator's mind. Increasingly, schools are requiring crisis management skills as part of the search criteria for qualified school presidential candidates. In turn, school presidents also are elevating the training and competency of their crisis teams.

Emergency and crisis management plans for violence/social disruption play into your property/equipment-related disaster management plan, with emphasis on steps and strategies that address the people or “social” aspects of crisis, including:

- A crisis management team from a broad spectrum of disciplines, including social services and law enforcement.
- A threat/vulnerability analysis that contemplates “at-risk” social behaviors and violence scenarios.
- Prevention strategies that include recognition of and services for troubled/at-risk students.
- A prompt response and post-crisis/recovery plan includes real-time communications and “chain of command” center.
- A process exists to allow employees, students and others to tell you about a dispute or troubling behaviors of others. Protect the confidentiality of the information, but investigate as appropriate and provide appropriate response and/or resources.
- Exercises and drills to test the response.

Educational Institutions Risk Management Guide

Response: real-time communications/chain of command

The communications component in emergency/crisis response is critical. Emphasis is on prompt, real-time communications and a centralized “chain of command”/coordination across the entire school/campus and with community agencies and resources, including law enforcement and social services.

The National Incident Management System (Homeland Security) or [Incident Command System \(ICS\)](#) model is being used by schools to help build a strong communication and coordination procedure in response to crisis. Social disaster crisis management includes, but is not limited to:

Prompt use of real-time communications using a variety of communication technologies, such as text messaging, reverse 911 and other forms, to alert about campus crisis.

- Communications and coordination/command response center, including school and community resources and incorporating the National ICS.
 - > School grantees of the Emergency Response and Crisis Management grant are required by the Office of Safe and Drug-Free Schools to adopt the [National Incident Command System for Schools](#) model.

- Decisions around lockdown and evacuation.
- Communications to parents and the community.
- Calling in social service/mental health resources, as appropriate.
- Offering crisis counseling to those who are impacted.
- Providing flexible learning options in the crisis aftermath.
- Pre-arranged relocation of central administration office.

Additionally, school administrators should have a clear understanding of FERPA and other privacy laws in identifying troubled/at-risk students, making social services available, and knowing what student information can be shared.



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